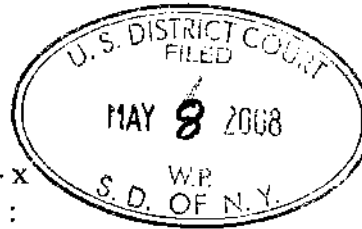


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



ORIGINAL

UNITED STATES OF AMERICA

- v. -

JAMES CURLEY,
a/k/a "Jim Harris"

Defendant.

SEALED
INDICTMENT

08 Cr. CRIM. 0404

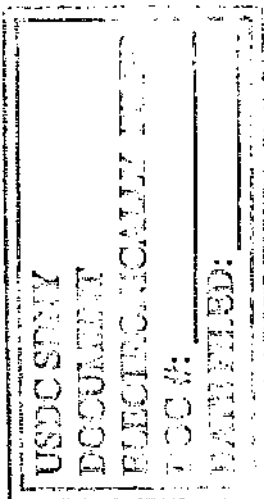
ROBINSON

COUNT ONE

The Grand Jury charges:

1. From in or about August 2006 through in or about October 2006, in the Southern District of New York and elsewhere, JAMES CURLEY, a/k/a "Jim Harris," the defendant, unlawfully, wilfully and knowingly traveled in interstate commerce, with the intent to kill, injure, harass, and place under surveillance with the intent to kill, injure, harass and intimidate another person, and in the course of and as a result of such travel placed that person in reasonable fear of death and serious bodily injury to that person and caused substantial emotional distress to that person, to wit, JAMES CURLEY, a/k/a "Jim Harris," traveled from Rockland County, New York to New Jersey with the intent to harass and place under surveillance a Victim ("Victim"), and as a result of such travel caused serious emotional distress to the Victim.

(Title 18, United States Code, Section 2261A(1).)



COUNT TWO

The Grand Jury further charges:

2. From in or about August 2006 through in or about October 2006, in the Southern District of New York and elsewhere, JAMES CURLEY, a/k/a "Jim Harris," the defendant, with the intent to kill, injure, harass and place under surveillance with the intent to kill, injure, harass and intimidate and cause substantial emotional distress to a person in another state, unlawfully, wilfully and knowingly used an interactive computer service and a facility of interstate commerce to engage in a course of conduct that caused substantial emotional distress to that person and placed that person in reasonable fear of the death of and serious bodily injury to that person, to wit, JAMES CURLEY, a/k/a "Jim Harris," used a computer to access global positioning system ("GPS") data for a GPS device that had been placed on the Victim's car and used that GPS data to follow the Victim in New York and New Jersey and place the Victim in fear of serious bodily injury by attempting to force the Victim's car to stop on a road and by stalking the Victim in New Jersey.

(Title 18, United States Code, Sections 2261A(2)(A) & 2.)

COUNT THREE


The Grand Jury further charges:

3. On or about October 9, 2006, in the Southern District of New York and elsewhere, JAMES CURLEY, a/k/a "Jim Harris," the defendant, unlawfully, wilfully and knowingly traveled in interstate and foreign commerce, with the intent to engage in conduct that violates the portion of a protection order that prohibits or provides protection against violence, threats, and harassment against, contact and communications with, and physical proximity to, another person, and that would violate such a portion of a protection order in the jurisdiction in which the order was

issued, and subsequently engaged in such conduct, to wit, JAMES CURLEY, a/k/a "Jim Harris," the defendant, traveled from Rockland County, New York, to New Jersey with the intent to stalk, harass, menace, recklessly endanger and intimidate, and did violate a Rockland County Family Court Order of Protection by traveling from Rockland County, New York to New Jersey in order to stalk, harass and intimidate the Victim in New Jersey.

(Title 18, United States Code, Section 2262(a)(1).)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney